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USAir

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DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

BEFORE THE DEPARTMENT OF TRANSPORTATION OFFICE OF THE SECRETARY WASHINGTON, D.C.

U.S.-TORONTO SERVICE PROCEEDING

Docket 50168

REBUTTAL EXHIBITS OF USAIR, INC.

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NARRATIVE INTRODUCTION TO USAIR'S REBUTTAL EXHIBITS

USAIR'S rebuttal exhibits demonstrate that USAir should be selected to continue operations between Pittsburgh and Toronto. USAir ranks first or second in DOT's historic selection criteria (US-R-101.) USAir offers more seats than any of the applicants in the Toronto gateway markets (US-R-113.) USAir is proposing double daily B-757 service with single plane service to Seattle and San Diego in the summer and Orlando and Phoenix in the winter. USAir's service is superior to that proposed by the other applicants. Although Delta offers B-757 service, it fails to offer single plane behind service. The other applicants plane to offer single plane service to points behind the gateway, but it will be with smaller narrow body equipment. US-R-114 demonstrates that USAir will offer more seats than any other applicant to single plane behind gateway points. USAir's Pittsburgh hub is the best positioned hub to maximize feed traffic between the U.S. and Toronto (US-R-105.) USAir's size and Pittsburgh's geographic location give USAir the unique ability to offer more connections via Pittsburgh to and from Toronto than any other applicant (US-R-102.) Furthermore, USAir will carry more traffic than any other applicants between its U.S. points behind Pittsburgh and Toronto (US-R-103.) Overall significantly more passengers will choose to use USAir's service than the service of Continental, Northwest or TWA.

USAir's Pittsburgh Hub

Ittsburgh is USAir's largest hub geographically positioned to take optimum advantage of flow traffic from the large U.S.-Toronto market. With Pittsburgh-Toronto nonstop service, USAir will be able to effectively compete in the total U.S.-Toronto market. Pittsburgh-Toronto nonstop authority will

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give USAir the ability to compete with Northwest at Detroit and American and United at Chicago for U.S.-Toronto traffic. Philadelphia, located 254 miles east of Pittsburgh, does not offer USAir non-circuitous access to Toronto that it needs to effectively compete with these three larger carriers in the U.S.-Toronto market. Over 80 USAir points containing 2.4 million passengers are better served via Pittsburgh (US-R-118.) The small O&D of the local market makes it a less important decisional factor in this case.

USAir's large Pittsburgh hub combined with the geographic location of Pittsburgh make USAir the best candidate for receiving the permanent authority. Positioned 222 miles south of Toronto, Pittsburgh is ideally located to flow traffic to and from Toronto.

USAir's Pittsburgh hub is larger than Continental at Newark, Northwest at Minneapolis and TWA at St. Louis.¹ Its size combined with its geographic location makes USAir the premier carrier for selection in this case. USAir's Pittsburgh hub will connect 84 cities with round trip nonstop service to Toronto. These cities generated 3.4 million Toronto passengers in fiscal year 1994 (US-R-102.) By contrast Delta will connect only 51 cities, TWA 46 cities, Northwest 42 cities and Continental 36 cities to Toronto.

US-R-105 graphically illustrates the location of each carrier hub. All other applicants' hubs have more limited geographical catchment areas for Toronto traffic. Continental's hub is located in the longested Northeast of the U.S., and will draw on a catchment area from the Eastern U.S. and

¹ DL-117.

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Florida. Delta's catchment area is limited to the Southeastern and Southwestern U.S. Minneapolis, located in the upper Midwest, limits Northwest's catchment area to the Northwest and Western segment of the U.S. Finally, TWA's catchment area will be limited to the western section of the Southern U.S. and the Western U.S.

USAir Seats and Service

USAir will offer more seats than any other applicant (US-R-113.) USAir is proposing double daily service with new B-757 aircraft. Delta is also proposing double daily B-757 service for the gateway segment, but will not provide any single plane behind gateway service. All other applicants are proposing double daily service with smaller narrow body equipment. Northwest is proposing to operate the older DC-9 aircraft with only 100 seats. USAir will offer 82% more seats than Northwest. Continental and TWA also will operate smaller narrow body equipment. USAir will operate 42% and 38% more seats than each. A comparison of single plane behind seats is shown at US-R-114. Similar to the gateway segment, USAir will offer more seats than the other applicants in behind gateway single plane markets.

Traffic Forecast

USAir's traffic forecast is the most conservative among the applicants. USAir used the FY 1994 &D traffic base and grew it at an annual rate of 1.9% to the forecast period. By contrast, Continental used a 5% annual growth rate. TWA used a 4.5% growth rate, and Delta and Northwest used 3.0% each. USAir did not use service stimulation or make any adjustments to the base to

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develop the forecast market size. Delta, Northwest and TWA used service stimulations of 50%, 15% and 100% respectively for their gateway markets.² For behind markets, Delta, Northwest and TWA similarly used stimulation that ranged between 10% and 50%.³ Although Continental did not use service stimulation, it arbitrarily increased the traffic base by 10% for so called "under reporting".⁴

USAir exhibit US-R-111 adjusts its traffic forecast using the other carriers' growth rates excluding stimulation assumptions. Under the other applicants growth formulas USAir's traffic would increase anywhere from 4,700 to 18,500 passengers. Load factors would increase anywhere from 3 to 12 per centage points.

² Delta's service stimulation of 50% in the Atlanta-Toronto market appears excessive in view of its historic operations of four daily one stop services. Service stimulation in the Atlanta-Toronto market accounts for 26,484 passengers in Delta's forecast passengers. If these passengers were abtracted from Delta's forecast, Delta's forecast passengers would be 156,395 or less than USAir's forecast for Pittsburgh-Toronto segment.

³ Source: DL-301, NW-301, and TW-301.

⁴ Source:CO-301.

COMPARISON OF APPLICANTS SERVICE PROPOSALS AND FORECASTS FOR U.S.-TORONTO (REBUTTAL TO APPLICANTS SERVICE PROPOSALS AND TRAFFIC FORECAST)

	<u>USAIR</u>		CONTINENTAL		<u>DELTA</u>		NORTHWEST		<u>TWA</u>	
		Source:		Source:		Source:		Source:		Source:
<u>Schedule</u>										
Gateway	Pittsburgh	US-201	Newark	CO-201	Atlanta	DL-101	Minneapolis	NW-202	St. Louis	TW-151
Single Plane Behind Point	Winter Sum		All Year	CO-201	NONE	DL-101	All Year	NW-202	All Year	TW-151
	Seattle Orla		Ft. Lauderdale	CO-201			Boise	NW-202	Phoenix	TW-151
	San Diego Phoe	enix US-201	Orlando	CO-201			Salt Lake City	NW-202	San Diego	TW-151
Service Level	2 Daily RTs	US-201	2 Daily RTs	CO-201	2 Daily RTs	DL-101	2 Daily RTs	NW-202	2 Daily RTs	TW-151
Equipment										
Aircraft Type	B-757	US-201	B-737	CO-201	B-757	DL-101	DC-9	NW-202	MD-80	TW-151
Seats	182	US-202	128	CO-201	180	DL-101	100	NW-200	132	TW-151
Seating Configuration	24/158	US-202	10/118	CO-201	24/156	DL-101	12/88		12/120	TW-151
Activity Statistics (Annual)								-		
Completion Factor	98%	US-403	98.2%	1/	97.8%	1/	99.0%	1/	99.7%	1/
Total Seats(Both Directions)	250,132	US-403	184,064	C0-401	257,760	1/	145,000	1/	192,720	1/
Total Frequencies	1,435	US-403	1,438	C0-401	1,432	DL-403	1,450	NW-404	1460	TW-404
Forecast Passengers	158,000	US-301	126,032	C0-301	182,879	DL-301	109,024	NW-301	105,170	TW-301
Load Factor	63.2%	US-403	68.5%	. 1/	70.9%	1/	75.2%	1/	54.6%	1/
	L) [l L			

1/ Calculated.

COMPARISON OF APPLICANTS SERVICE PROPOSALS AND FORECASTS FOR U.S.-TORONTO

(REBUTTAL TO APPLICANTS SERVICE PROPOSALS AND TRAFFIC FORECAST)

	USA	I <u>R</u>	CONT	NENTAL	DE	LTA	NO	RTHWES	Ι		<u>TWA</u>	
Passenger Forecast		Source:		Source:		Source:		S	Source:			Source:
Traffic Base	FY1994 O&D	US-301	CY 1993 O&D	C0-301	CY 1993 O&D	DL-301	CY 1993	N	IW-301	FY 1994		TW-301
Adjustments	-											
Underreporting	No		10.0%	C0-301								
Stimulation	No		No			larket DL-301	15.0%		₩-301	100.0%	Market	TW-301
					2.0% Behin	d Points DL-301	10.0%		IW-301	0.0%	Phoenix	TW-301
							30.0%	Boise N	IW-301	50.0%	San Diego	TW-301
Traffic Mix							11					
Gateway	15,559	US-301	59,964	C0-301	79,453	DL-301	18,096		IW-301	46230		TW-301
Single plane behind point	16,126	US-301	16,615	C0-301	-	DL-301	5,799		W-301	17309		TW-301
RT Single Connex	120,238	US-301	35,109	C0-301	103,426	DL-301	80,936	N	W-301	36732		TW-301
RT Double Connects	-			C0-301	-	DĽ-301	-			-		TW-301
Interline Connections	6,077	US-301	8,760	C0-301	-	DL-301	4,193	N	IW-301	4900		TW-301
Other	-			le Share Premium	<u> </u>	DL-301	<u> </u>	=	1	-	=	TW-301
Total	158,000		126,032		182,879		109,024			105,171		
Online Behind Cities	95	US-301	53	C0-301	66	DL-301	59	Α.	W-301	52		TW-301
Online Benind Cities Online Behind Cities Traffic	3,481,010	US-301	1,199,450	C0-301	951,080	DL-301	1,311,820		W-301	1,050,580		TW-301
(Base Year)	3,461,010	03-301	1,199,450	C0-301	951,080	DL-301	1,311,820	IX	444-201	1,030,300		100-501
(Base Year) Annual Growth	1.9%	US-301	5.0%	C0-301	3.0%	DL-301	3.0%		W-301	4.5%		TW-301
Allitual Glowth	1.5%	03-301	3.076	C0-301	3.0%	DL-301	3.0%	IN.	100-301	4.576		100-501
Market Share												
Method	QSI INTERNAL MO	DEL	QSI INTERNAL M	ODEL CO-301	QSI MODEL	DL-301	QSI			QSI		
%												
Passengers	ALL PROPERTY OF THE PROPERTY O									1		
Gateway	48.4%	US-301	20.0%	C0-301	55.0%	DL-301	30.0%		W-301	75.0%		TW-301
Single Plane	8.3%	US-301	12.5%	C0-301	-	DL-301	24.5%		W-301	14.8%		TW-301
Connex Single Online	3.4%	US-301	2.9%	C0-301	10.2%	DL-301	5.6%	N	W-301	3.6%		TW-301
Ü												
Cargo Forecast												
Annual Tons	1591	US-403	331 C	O-205 CO-205	NONE	DL-402	803	٨	W-402	NONE		TW-401
] [<u></u>		

COMPARISON OF APPLICANTS SERVICE PROPOSALS AND FORECASTS FOR U.S.-TORONTO

(REBUTTAL TO APPLICANTS SERVICE PROPOSALS AND TRAFFIC FORECAST)

	USAIR		CONTINENTAL		<u>DELTA</u>		NORTHWEST		<u>T\</u>	<u>NA</u>
Financials (000)		Source:		Source:		Source:		Source:		Source:
Operating Revenues										
Passenger	\$29,315	US-401	\$13,528	CO-401	\$35,648	DL-402	\$21,870	NW-401	\$19,714	TW-401
Cargo	\$741	US-401	\$361	CO-401	\$1,540	DL-402	\$404	NW-401	\$374	TW-401
Other	\$2,183	US-401	\$161	CO-401		DL-402	\$919	NW-401		TW-401
Total	\$32,239	US-401	\$14,050		\$37,188	DL-402	\$23,193		\$20,088	
Operating Expense	\$16,348	US-401	\$11,863	CO-401	\$20,848	DL-402	\$13,107	NW-401	\$13,474	TW-401
Profit	\$15,892	US-401	\$2,187	CO-401	\$16,340	DL-402	\$10,086	NW-401	\$6,614	TW-401
Profit Margin	49.3%		15.6%		43.9%		43.5%		32.9%	
(% OF Revenue)						J	V		· <u> </u>	

USAIR RANKS FIRST OR SECOND IN CARRIER SELECTION CRITERIA

(REBUTTAL TO: CO-201, DL-101, NW-202, AND TW-151)

SEATS ON SEGMENT	FIRST
SEATS SINGLE PLANE SERVICE	FIRST
BEYOND POINTS	FIRST
BEYOND TRAFFIC	FIRST
HUB LOCATION TO MAXIMIZE FEED	FIRST
TOTAL TRAFFIC	SECOND

SOURCES: SEATS ON SEGMENT US-R-113, SEATS SINGLE PLANE SERVICE US-R-114, BEYOND POINTS US-R-101, BEYOND TRAFFIC US-R-101, HUB LOCATION TO MAXIMIZE FEED US-R-105, TOTAL TRAFFIC US-R-104.

USAIR SERVES MORE BEYOND CITIES WITH MORE TRAFFIC THAN ANY OTHER APPLICANT (REBUTTAL TO: CO-301, DL-301, NW-301, TW-301)

CARRIER	HUB	BEYOND CITIES	BEYOND TRAFFIC
USAIR	PITTSBURGH	84	3,412,830
CONTINENTAL	NEWARK	36	1,545,090
DELTA	ATLANTA	51	1,384,300
TWA	ST. LOUIS	46	1,004,930
NORTHWEST	MINNEAPLOIS	42	712,430

SOURCES: US-R-106 THRU US-R-109.

USAIR CARRIES MORE BEHIND TRAFFIC THAN ANY OTHER APPLICANT

(REBUTTAL TO: CO-301, DL-301, NW-301, TW-301)

CARRIER	<u>HUB</u>	USAIR BEYOND TRAFFIC
USAIR	PITTSBURGH	142,441
DELTA	ATLANTA	103,426
NORTHWEST	MINNEAPOLIS	90,928
CONTINENTAL	NEWARK	66,068
TWA	ST. LOUIS	58,941

SOURCES: US-R-101.

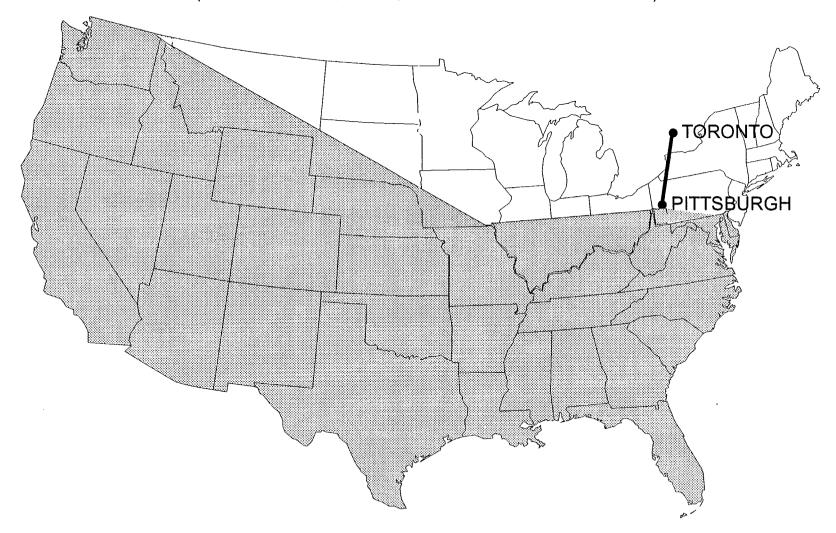
USAIR CARRIES MORE TOTAL TRAFFIC THAN CONTINENTAL, NORTHWEST AND TWA (REBUTTAL TO: CO-301, NW-301, TW-301)

CARRIER	<u>HUB</u>	TOTAL TRAFFIC
USAIR	PITTSBURGH	158,000
CONTINENTAL	NEWARK	126,032
NORTHWEST	MINNEAPOLIS	109,024
TWA	ST. LOUIS	105,171

SOURCES: US-R-101.

USAIR'S PITTSBURGH HUB OFFERS THE BROADEST NON-CIRCUITOUS ACCESS TO TORONTO

(REBUTTAL TO:CO, DL, NW, AND TWA SERVICE PROPOSALS)



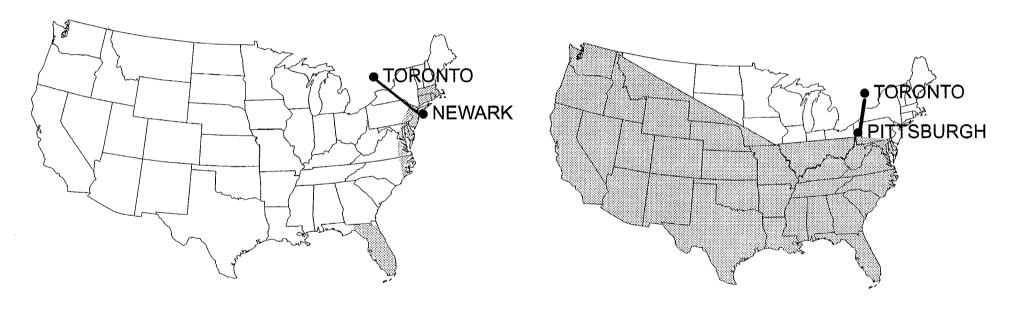
NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY VIA PITTSBURGH.

USAIR'S PITTSBURGH HUB OFFERS THE BROADEST NON-CIRCUITOUS ACCESS TO TORONTO

(REBUTTAL TO: CO'S SERVICE PROPOSAL)

CONTINENTAL'S HUB

USAIR'S HUB



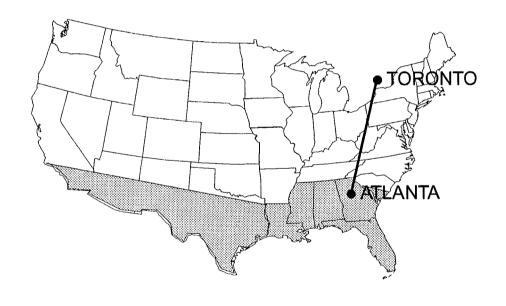
NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA NEWARK AND PITTSBURGH.

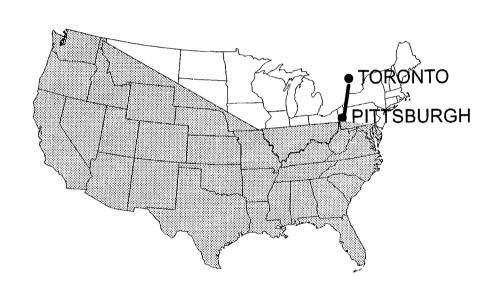
USAIR'S PITTSBURGH HUB OFFERS THE BROADEST NON-CIRCUITOUS ACCESS TO TORONTO

(REBUTTAL TO: DL'S SERVICE PROPOSAL)

DELTA'S HUB

USAIR'S HUB





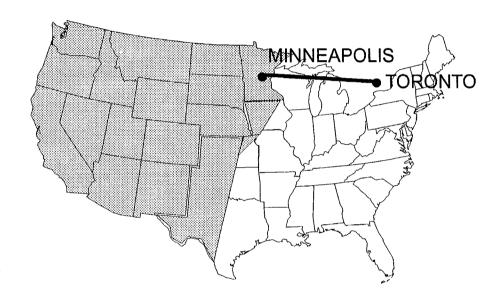
NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA ATLANTA AND PITTSBURGH.

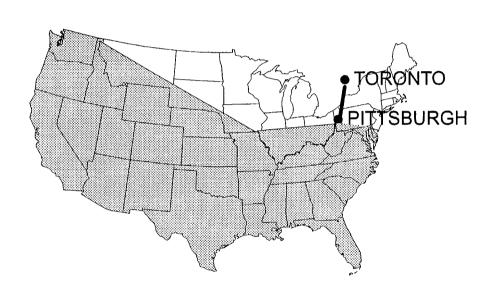
USAIR'S PITTSBURGH HUB OFFERS THE BROADEST NON-CIRCUITOUS ACCESS TO TORONTO

(REBUTTAL TO: NW'S SERVICE PROPOSAL)

NORTHWEST'S HUB

USAIR'S HUB





NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA MINNEAPOLIS AND PITTSBURGH.

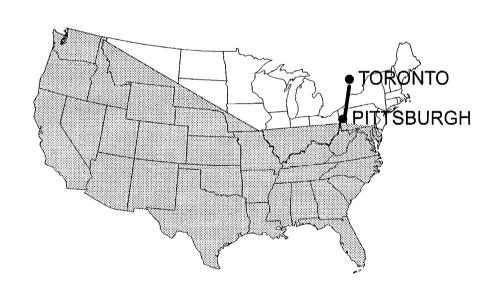
USAIR'S PITTSBURGH HUB OFFERS THE BROADEST NON-CIRCUITOUS ACCESS TO TORONTO

(REBUTTAL TO: TW'S SERVICE PROPOSAL)

TWA'S HUB

TORONTO

USAIR'S HUB



NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA ST. LOUIS AND PITTSBURGH.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN CONTINENTAL'S BEYOND CITIES (REBUTTAL TO CO-301)

	FY JUNE 94 TORONTO TRAFFIC	<u>USAIR VIA</u> <u>PITTSBURGH</u>	FY JUNE 94 TORONTO TRAFFIC	CONTINENTAL via NEWARK	FY JUNE 94 TORONTO TRAFFIC
AKRON/CANTON	520	YES	520		
ALBANY	2,070	YES	2,070	YES	2,070
ALLENTOWN	3,270	YES	3,270	YES	3,270
ALTOONA	120	YES	120	YES	120
ASHLAND, KY/HUNTINGTON	310	YES	310		
ATLANTA	90,440	YES	90,440	YES	90,440
ATLANTIC CITY	1,370			YES	1,370
AUSTIN	11,130	YES	11,130		
BALTIMORE	19,580	YES	19,580	YES	19,580
BANGOR	700 90	VEC	90	YES YES	700 90
BINGHAMTON BOSTON	213,410	YES YES	213,410	YES	213,410
BURLINGTON	1,310	YES	1,310	123	210,410
CHARLESTON, WV	540	YES	540		
CHARLOTTESVILLE	1,060	YES	1,060		
CHARLOTTE	19,900	YES	19,900		
CHICAGO	325,130	YES	325,130		
CINCINNATI	8,340	YES	8,340		
CLARKSBURG, WV	320	YES	320		
CLEVELAND	52,910	YES	52,910	YES	52,910
COLUMBUS	11,410	YES	11,410	YES	11,410
CUMBERLAND	150	YES	150		
DALLAS/FT. WORTH	108,920	YES	108,920	VEC	2 200
DAYTON	3,390 41,960	YES YES	3,390 41,960	YES, YES	3,390 41,960
DENVER DETROIT	81,870	YES	81,870	TEO	41,900
FLINT .	720	YES	720		
FT. LAUDERDALE	34,950	YES	34,950	YES	34,950
FT. MYERS	15,100	YES	15,100		0 1,000
FT. WAYNE	3,690	YES	3,690	.*	
GRAND RAPIDS	10,610	YES	10,610		
GREENBRIER	60	YES	60		
GREENSBORO/HIGH POINT	8,330	YES	8,330	YES	8,330
HAGERSTOWN	340	YES	340		
HARRISBURG	4,710	YES	4,710	YES	4,710
HARTFORD	24,040	YES	24,040	YES	24,040
HOUSTON INDIANAPOLIS	22,530 15,520	YES YES	22,530 15,520	YES YES	22,530 15,520
ISLIP/LONG ISLAND	990	YES	990	IES	15,520
JACKSONVILLE, FL	9,190	120	330	YES	9,190
JOHNSTOWN	50	YES	50	120	0,.00
KALAMAZOO	3,920	YES	3,920		
KANSAS CITY	21,180	YES	21,180		
KNOXVILLE	4,440	YES	4,440		
LANCASTER	860	YES	860		
LA	1,570	YES	1,570		
LAS-ZEGAS	32,500	YES	32,500		
LEXINGTON/FRANKFORT	2,120	YES	2,120	VE0.	040.050
LOS ANGELES	242,650	YES	242,650	YES	242,650
LOUISVILLE	7,230 440	YES YES	7,230 440		
LYNCHBURG MANCHESTER	1,690	YES	1,690	YES	1,690
MIAMI ,	208,180	YES	208,180	YES	208,180
MILWAUKEE	25,760	YES	25,760	120	200,100
MINNEAPOLIS/ST.PAUL	53,220	YES	53,220		
	, ==		, = -		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN CONTINENTAL'S BEYOND CITIES (REBUTTAL TO CO-301)

	FY JUNE 94 TORONTO TRAFFIC	<u>USAIR VIA</u> <u>PITTSBURGH</u>	FY JUNE 94 TORONTO TRAFFIC	CONTINENTAL via NEWARK	FY JUNE 94 TORONTO TRAFFIC
	400	\/=o	400		
MORGANTOWN	160	YES	160		
NASHVILLE	45,340	YES	45,340		
NEW ORLEANS	30,250	YES	30,250		
NEWARK	752,110	YES	752,110		
NEWBURGH	340	YES	340	VEC	5.040
NORFOLK	5,240	YES	5,240	YES	5,240
ORLANDO	67,810	YES	67,810	YES	67,810
PARKERSBURG	230	YES	230	VEC	444.000
PHILADELPHIA	111,630	YES	111,630	YES	111,630
PHOENIX	56,890	YES	56,890	YES	56,890
PORTLAND ME	4,720	VEC	0.000	YES	4,720
PROVIDENCE	2,330	YES	2,330	YES	2,330
RALEIGH/DURHAM	30,440	YES	30,440		
READING	810	YES	810	VEC	7.000
RICHMOND	7,230	YES	7,230	YES	7,230
ROANOKE	1,770 2,090	YES	1,770 2,090		
SAGINAW		YES YES	2,090 34,520		
SAN DIEGO	34,520 175,690	YES	•		
SAN FRANCISCO	15,090	150	175,690	YES	15,090
SAN JUAN	13,300	VEC	13,300	150	15,090
SANTA ANA SARASOTA/BRADENTON	9,040	YES YES	9,040	YES	9,040
SCRANTON/WILKES-BARRE	1,610	YES	9,040 1,610	TES	9,040
SEATTLE	29,480	YES	29,480		
SOUTH BEND	5,380	YES	5,380		
STATE COLLEGE	370	YES	3,360		
STATE COLLEGE ST. LOUIS	28,570	YES	28,570		
TAMPA	186,290	YES	186,290	YES	186,290
TOLEDO	710	YES	710	163	100,290
WASHINGTON	45,040	YES	45,040	YES	45,040
WEST PALM BEACH	21,060	YES	21,060	YES	21,060
WHITE PLAINS	27,000 820	YES	21,000 820	160	21,000
WILLIAMSPORT	520 520	YES	520 520		
WORCESTER	210	1 E3	520	YES	210
YOUNGSTOWN	210	YES	210	1 L3	210
TOTAL				0.0	4 545 066
TOTAL		84	3,412,830	36	1,545,090

Notes: Excludes cities in western NY State and other cities with excessive circuity. For EWR, cities include those cited in CO's filing with roundtrip non-stop connections to YYZ. For PIT, cities include those cited in US's filing with roundtrip non-stop connections to YYZ.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN DELTA'S BEYOND CITIES (REBUTTAL TO DL-301)

	FY JUNE 94 TORONTO TRAFFIC	USAIR VIA PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	<u>DELTA</u> via ATLANTA	FY JUNE 94 TORONTO TRAFFIC
AKRON/CANTON	520	YES	520		
ALBANY	2,070	YES	2,070		
ALLENTOWN	3,270	YES	3,270		
ALTOONA	120	YES	120		
ASHEVILLE	1900			YES	1,900
ASHLAND, KY/HUNTINGTON, W	310	YES	310		
ATLANTA	90,440	YES	90,440		
AUSTIN BALTIMORE	11,130 19,580	YES YES	11,130 19,580		
BATON ROUGE	2300	163	19,500	YES	2,300
BINGHAMTON	90	YES	90	120	2,000
BIRMINGHAM	4510	. = 0		YES	4,510
BOSTON	213,410	YES	213,410		
BRISTOL,TN	1500			YES	1,500
BURLINGTON	1,310	YES	1,310		
CHARLESTON, SC	4260	VEO	540	YES	4,260
CHARLESTON, WV	540 1,060	YES YES	540 1,060		
CHARLOTTESVILLE CHARLOTTE	19,900	YES	19,900	YES	19,900
CHATTANOOGA	3500	123	19,300	YES	3,500
CHICAGO	325,130	YES	325,130	. 20	0,000
CINCINNATI	8,340	YES	8,340		
CLARKSBURG	320	YES	320		
CLEVELAND	52,910	YES	52,910		
COLUMBIA	3980			YES	3,980
COLUMBUS, GA	1340			YES	1,340
COLUMBUS, MS COLUMBUS, OH	600 11,410	YES	11,410	YES	600
CUMBERLAND	150	YES	150		
DALLAS/FT. WORTH	108,920	YES	108,920	YES	108,920
DAYTONA BEACH	3610		,	YES	3,610
DAYTON	3,390	YES	3,390		
DENVER	41,960	YES	41,960	YES	41,960
DETROIT	81,870	YES	81,870	. 4mm	
DOTHAN	230	VEC	700	YES	230
FLINT FT. LAUDERDALE	720 34,950	YES YES	720 34,950	YES	34,950
FT. MYERS	15,100	YES	15,100	YES	15,100
FT. WAYNE	3,690	YES	3,690	120	10,100
GAINESVILLE	1140		,	YES	1,140
GRAND RAPIDS	10,610	YES	10,610		
GREENBRIER	60	YES	60		
GREENSBORO/HIGH POINT	8,330	YES	8,330	\/F0	0.000
GREENVILLE/SPARTANBURG GUERORT/BILOXI	6200 450			YES YES	6,200 450
HA RSTOWN	340	YES	340	150	450
HARRISBURG	4,710	YES	4,710		
HARTFORD	24,040	YES	24,040		
HOUSTON	22,530	YES	22,530	YES	22,530
HUNTSVILLE/DECATUR	3760			YES	3,760
INDIANAPOLIS	15,520	YES	15,520		
ISLIP/LONG ISLAND	990	YES	990	VEO	0.400
JACKSONVILLE, FL JACKSON	9,190 2090			YES YES	9,190
JACKSON	2090			159	2,090

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN DELTA'S BEYOND CITIES (REBUTTAL TO DL-301)

DOHNSTOWN S0	_	FY JUNE 94 TORONTO TRAFFIC	USAIR VIA PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	<u>DELTA</u> via ATLANTA	FY JUNE 94 TORONTO TRAFFIC
KALAMAZOO 3,920 YES 3,920 KANSAS CITY 21,180 YES 21,180 YES 21,180 KANSAS CITY 21,180 YES 4,440 KANSAS CITY 21,180 YES 4,440 KANSAS CITY 21,180 YES 4,440 LANCASTER 860 YES 860 LANCASTER 860 YES 32,500 LAS VEGAS 32,500 YES 32,500 LEXINCTON/FRANKFORT 2,120 YES 2,120 LEXINCTON/FRANKFORT 2,120 YES 2,120 LUTILE ROCK 4060 LOS ANGELES 242,650 YES 242,650 LOUISVILLE 7,230 YES 7,230 LYSS 4400 MACON 90 YES 1,890 MEMPHIS 11470 YES 11,470 MERDIDIN 160 MANUHESTER 1,890 YES 208,180 YES 208,180 MEMPHIS 11470 YES 160 MILWAUKE 25,760 YES 25,760 MILWAUKE 25,760 YES 25,760 MINNEAPOLIS/ST.PAUL 83,220 YES 53,220 MOBILE 1490 YES 3,220 MOBILE 1490 YES 8,880 MONTGOMERY 1370 YES 160 MONROM 160 YES 160 MONROM 160 YES 160 MYRIL BEACH 5140 YES 45,340 YES 45,340 NORGANTOWN 160 YES 30,250 MORGANTOWN 170 YES 752,110 MORGANTOWN 170 YES 752,110 MORGANTOWN 170 YES 30,250 MEWBURGH 340 YES 340 NEW ORLEANS 30,250 YES 30,250 NEWARK 752,110 YES 752,110 NEWBURGH 340 YES 340 NORGANTOWN 170 YES 67,810 NEWARK 752,110 YES 752,110 NORGANTOWN 11,600 YES 30,250 NEWARK 752,110 YES 752,110 NEWBURGH 340 YES 340 NORGANTOWN 11,600 YES 67,810 YES 67,810 NORFOLK 5,240 YES 52,840 REMANK 752,110 YES 752,110 NORFOLK 5,240 YES 30,250 PENSACOLA 1970 PANAMACITY 3000 PARKERSBURG 230 YES 230 PENSACOLA 1970 PANAMACITY 3000 PARKERSBURG 230 YES 230 PENSACOLA 1970 PANAMACITY 3000 PARKERSBURG 230 YES 230 PENSACOLA 1970 PANAMACITY 3000 PARKERSBURG 230 YES 2,330 RALEIGH/DURHAM 30,440 YES 30,440 READING 810 YES 811,650 NORTOLK 1,770 YES 1,770 SAGINAW 2,090 YES 2,330 RALEIGH/DURHAM 30,440 YES 30,440 READING 810 YES 11,650 NORTOLK 1,770 YES 1,750 NORDOLK 1,770 YES 1,770 NORDOLK 1,7						
KANSAS CITY 21,180 YES 21,180 YES 21,180 KNOXVILE 4,440 YES 4,440 YES 4,440 YES 4,440 YES 4,440 YES 4,440 LANCASTER 860 YES 860 LANSING 1,570 YES 1,570 LAS VEGAS 32,500 YES 32,500 LEXINOTONIFRANKFORT 2,120 YES 2,120 YES 2,42,650 YES 242,650 LOIS ANGELES 242,650 YES 242,650 YES 242,650 LOIS ANGELES 242,650 YES 242,650 YES 242,650 LOIS ANGELES 1,720 YES 7,230 YES 7,230 YES 1,690 YES 11,470 YES 1,470 MCROIDAIN 1,600 YES 1,690 YES 3,690 YES 3,690 YES 3,000	JOHNSTOWN					
NADXVILLE						
LANSING						
LANSING					YES	4,440
LAS VEGAS LEXINGTON/FRANKFORT LITILE ROCK LOS ANGELES LYCA SEGO LOS ANGELES LYCA SEGO LOS ANGELES LYCA SEGO MACON 90 MACO						
LEXINGTON/FRANKFORT						
LITTLE ROCK 4060						
LOS ANGELES				-,	YES	4,060
LYNCHBURG		242,650	YES	242,650	YES	242,650
MACON 90 YES 1,690 YES 1,690 MANCHESTER 1,690 YES 11,470 YES 11,470 MEMPHIS 11470 YES 11,470 YES 11,470 MERIDIAN 160 YES 208,180 YES 208,180 MILWAUKEE 25,760 YES 25,760 YES 25,760 MINNEAPOLIS/ST.PAUL 53,220 YES 35,220 YES 1,490 MORILE 1490 YES 680 YES 680 MONTGOMERY 1370 YES 1,490 MORGANTOWN 160 YES 160 MYRTLE BEACH 5140 YES 45,340 YES 30,250 MSHULLE 45,340 YES 45,340 YES 30,250 NEWARK 752,110 YES 30,250 YES 30,250 NEWBURGH 340 YES 52,410 YES 67,810 NORFOLK 5,240 YES	LOUISVILLE					
MANCHESTER 1,890 YES 1,690 MEMPHIS 11470 YES 11,470 MERIDIAN 160 YES 208,180 YES 208,180 MILWAUKEE 25,760 YES 25,760 YES 208,180 MILWAUKEE 25,760 YES 53,220 YES 1,490 MONROE 680 YES 1,490 MONROE 680 YES 1,370 MORGANTOWN 160 YES 13,370 MORGANTOWN 160 YES 1,490 MYRTLE BEACH 5140 YES 45,340 YES 45,340 NEW ORLEANS 30,250 YES 30,250 YES 30,250 NEWARK 752,110 YES 752,110 YES 30,250 NEWBURGH 340 YES 340 YES 67,810 NORFOLK 5,240 YES 5,440 YES 67,810 PANAMA CITY 300 YES 56,810			YES	440		
MEMPHIS 11470 MERIDIAN YES 11470 MERIDIAN YES 11470 MERIDIAN YES 208,180 YES 208,140 YES 40,490 YES 680 MONTGOMEN 40,490 YES 680 MONTGOMEN 41,490 YES 680 MONTGOMEN 41,490 YES 680 MONTGOMEN 45,340 YES 680 MONTGOMEN 45,340 YES 45,240 YES 30,250 YES					YES	90
MERIDIAN 160 YES 208,180 YES 208,180 MIAMI 208,180 YES 25,760 YES 25,760 YES 25,760 MINWADPOLIS/ST.PAUL 53,220 YES 53,220 YES 1,490 MORROE 680 YES 1,490 MONROE 680 YES 1,370 MORGANTOWN 160 YES 160 MYRTLE BEACH 5140 YES 30,250 MEW ORLEANS 30,250 YES 30,250 NEW ORLEANS 30,250 YES 30,250 NEW BURGH 340 YES 340 NORFOLK 5,240 YES 340 NORFOLK 5,240 YES 340 NORFOLK 5,240 YES 3,000 PANAMA CITY 3000 YES 67,810 YES 3,000 PARKERSBURG 230 YES 230 YES 1,970 PHILADELPHIA 111,630 YES			YES	1,690	٧٣٥	44 470
MIAMI 208,180 YES 208,180 YES 208,180 MILWAUKEE 25,760 YES 53,220 YES 53,220 MOBILE 1490 YES 53,220 MORNEO 680 YES 1,490 MONTGOMERY 1370 YES 1,370 MORGANTOWN 160 YES 5,140 MYRTLE BEACH 5140 YES 45,340 NASHVILLE 45,340 YES 30,250 YES 30,250 NEWARK 752,110 YES 752,110 YES 30,250 NEWBURGH 340 YES 340 YES 30,055 NEWBURGH 340 YES 5,240 YES 30,000 PANAMA CITY 3000 YES 67,810 YES 3,000 PARKERSBURG 230 YES 230 YES 1,970 PHILADELPHIA 111,630 YES 111,630 YES 1,970 PHILADELPHIA 111,630 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>						
MILWAUKEE 25,760 YES 25,760 MINNEAPOLIS/ST.PAUL 53,220 YES 53,220 MORDE 680 YES 680 MONTGOMERY 1370 YES 1,370 MORGANTOWN 160 YES 160 YES 5,140 MYRTLE BEACH 5140 YES 45,340 YES 45,340 YES 30,250 YES			VES	208 180		
MINNEAPOLIS/ST.PAUL 53,220 YES 53,220 MOBILE 1490 YES 680 MONROE 680 YES 680 MONROE 680 YES 680 MONTGOMERY 1370 YES 1,370 MORGANTOWN 160 YES 160 YES 5,140 NASHVILLE 45,340 YES 30,250 Y					120	200,100
MOBILE 1490 YES 1.490 MONROE 680 YES 680 MONTGOMERY 1370 YES 1.370 MORGANTOWN 160 YES 160 MYRTLE BEACH 5140 YES 45,340 YES 45,340 NASHYILLE 45,340 YES 30,250 YES 30,250 NEW ORLEANS 30,250 YES 30,250 YES 30,250 NEWBURGH 340 YES 340 YES 30,250 NEWBURGH 340 YES 340 YES 30,250 NEWBURGH 340 YES 340 YES 67,810 NORFOLK 5,240 YES 5,240 YES 67,810 NORFOLK 5,240 YES 67,810 YES 3,000 PARKERSBURG 230 YES 230 YES 1,970 PHILADELPHIA 111,630 YES 11,630 YES 1,970 PHOENIX						
MONROE 680 MONTGOMERY 480 1370 YES YES 680 1,370 MORGANTOWN 160 YES 160 MYRTLE BEACH 5140 YES 45,340 YES 45,340 NEW ORLEANS 30,250 YES 30,250 YES 30,250 NEWARK 752,110 YES 752,110 YES 340 NORFOLK 5,240 YES 5,240 YES 67,810 PANAMA CITY 3000 YES 230 YES 3,000 PARKERSBURG 230 YES 230 YES 1,970 PHILADELPHIA 111,630 YES 111,630 YES 1,970 PHILADELPHIA 111,630 YES 2,330 YES 1,970 PHILADELPHIA 111,630 YES 30,440 YES 1,970 PHOENIX 56,890 YES 56,890 YES 1,970 PROVIDENCE 2,330 YES 1,230 YES 1,540 READING </td <td></td> <td></td> <td> 0</td> <td>00,220</td> <td>YES</td> <td>1,490</td>			0	00,220	YES	1,490
MORGANTOWN MYRTLE BEACH NASHVILLE 160 5140 YES 160 YES 45,340 YES 45,340 YES 45,340 YES 45,340 YES 45,340 YES 45,340 YES 45,340 YES 30,250 YES 30,250 YES 30,250 YES 30,250 YES 30,250 YES YES 30,250 YES 30,250 YES YES 67,810 YES 72,240 YES 72,240 YES 30,000 YES 72,900 YES 72,900 YES 72,900 YES 72,300 YES 72,300 YES 72,300 YES 72,300 YES 72,300 YES 72,300 YES 72,300 YES 72,300 YES 72,400 YES 72,400 YES 72,400 YES 72,500 YES 72,500 YES 72,500 YES						
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NASHVILLE 45,340 YES 45,340 YES 45,340 NEW ORLEANS 30,250 YES 30,250 YES 30,250 NEWARK 752,110 YES 752,110 NEWBURGH 340 YES 340 NORFOLK 5,240 YES 5,240 YES 67,810 YES 67,810 PANAMA CITY 3000 YES 67,810 YES 3,000 PARKERSBURG 230 YES 230 YES 1,000 PENSACOLA 1970 YES 1,970 YES 1,970 PHILADELPHIA 111,630 YES 111,630 YES 1,970 PHOENIX 56,890 YES 56,890 YES 1,970 PROVIDENCE 2,330 YES 30,440 YES 30,440 READING 810 YES 30,440 YES 1,770 RICHMOND 7,230 YES 1,770 YES 1,770 SAGINAW 2,090			YES	160		
NEW ORLEANS 30,250 YES 30,250 YES 30,250 NEWARK 752,110 YES						
NEWARK 752,110						
NEWBURGH					YES	30,250
NORFOLK 5,240 YES 5,240 ORLANDO 67,810 YES 67,810 YES 67,810 PANAMA CITY 3000 YES 230 YES 3,000 PARKERSBURG 230 YES 230 YES 1,970 PENSACOLA 1970 YES 111,630 YES 1,970 PHILADELPHIA 111,630 YES 56,890 YES 56,890 PHOENIX 56,890 YES 56,890 YES 2,330 PROVIDENCE 2,330 YES 2,330 YES 2,330 RALEIGH/DURHAM 30,440 YES 30,440 YES 30,440 READING 810 YES 17,70 YES 1,770 SAGINAW 2,090 YES 1,770 YES 17,540 SAN ANTONIO 12080 YES 34,520 YES 175,690 SAN ANGISCO 175,690 YES 175,690 YES 15,090 SAN JA				·		
ORLANDO 67,810 YES 67,810 YES 67,810 PANAMA CITY 3000 YES 230 YES 3,000 PARKERSBURG 230 YES 230 YES 1,970 PENSACOLA 1970 YES 111,630 YES 1,970 PHILADELPHIA 111,630 YES 56,890 YES 56,890 PHOENIX 56,890 YES 56,890 YES 2,330 PROVIDENCE 2,330 YES 2,330 YES 2,330 RALEIGH/DURHAM 30,440 YES 30,440 YES 1,770 READING 810 YES 810 YES 1,770 YES 1,770 YES 1,770 YES 1,770 YES 1,7540 YES 12,080 YES 12,080 YES 12,080 YES 12,080 YES 175,690 YES 175,690 YES 175,690 YES 175,690 YES 15,090 YES 15,090					i	
PANAMA CITY PARKERSBURG 230 PEN SACOLA YES 230 PENSACOLA YES 230 PENSACOLA YES 1,970 PHILADELPHIA 111,630 PES PENSACOLA YES 111,630 PES PENSACOLA YES 111,630 PES PENSACOLA YES 111,630 PES PENSACOLA YES 1,970 PES PENSACOLA YES 1,970 PES PENSACOLA YES 1,970 PES PENSACOLA YES 1,970 PES PENSACOLA YES PENSACOLA 1,970 PES PENSACOLA 1,970 PES PENSACOLA 1,040 PES					YES	67.810
PARKERSBURG PENSACOLA 1970 PHILADELPHIA 111,630 PHOENIX 56,890 PROVIDENCE 2,330 RALEIGH/DURHAM 30,440 READING RICHMOND 7,230 ROANOKE 1,770 YES 1,770 SAN ANTONIO SAN DIEGO SAN JAN SARASOTA/BRADENTON SAVANNAH SCRANTON/WILKES-BARRE SHEVEPORT 1640 SHEVEPORT 1640 SHEVEPORT 1640 PES 11,970 YES 111,630 YES 56,890 YES 56,890 YES 56,890 YES 56,890 YES 56,890 YES 30,440 RES 11,330 YES 30,440 YES 17,540 YES 17,540 YES 175,690 YES 1				27,212		
PHILADELPHIA 111,630 YES 111,630 PHOENIX 56,890 YES 56,890 PROVIDENCE 2,330 YES 2,330 RALEIGH/DURHAM 30,440 YES 30,440 READING 810 YES 810 RICHMOND 7,230 YES 7,230 ROANOKE 1,770 YES 1,770 SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN PANCISCO 34,520 YES 34,520 SAN JAN 15,090 YES 175,690 SAN JAN 15,090 YES 13,300 SANTA ANA 13,300 YES 13,300 SAVANNAH 4440 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES		230	YES	230		,
PHOENIX 56,890 YES 56,890 PROVIDENCE 2,330 YES 2,330 RALEIGH/DURHAM 30,440 YES 30,440 READING 810 YES 810 RICHMOND 7,230 YES 7,230 ROANOKE 1,770 YES 1,770 SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN PANCISCO 34,520 YES 34,520 SAN JAN 15,090 YES 175,690 YES 15,090 SANTA ANA 13,300 YES 13,300 YES 15,090 SAVANNAH 4440 YES 9,040 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 YES 1,640 SHREVEPORT 1640 YES 5,380 YES 1,640	PENSACOLA				YES	1,970
PROVIDENCE 2,330 YES 2,330 RALEIGH/DURHAM 30,440 YES 30,440 READING 810 YES 810 RICHMOND 7,230 YES 7,230 ROANOKE 1,770 YES 1,770 SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN DIEGO 34,520 YES 34,520 SAN PANCISCO 175,690 YES 175,690 YES 15,090 YES 15,090 SANTA ANA 13,300 YES 13,300 SARASOTA/BRADENTON 9,040 YES 1,610 SAVANNAH 4440 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,640 SHREVEPORT 1640 YES 5,380						
RALEIGH/DURHAM READING READING RICHMOND RICHMOND ROANOKE 1,770 YES 1,770 SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 SAN ANTONIO 12080 SAN DIEGO 34,520 YES 175,690 YES 175,6						
READING 810 YES 810 RICHMOND 7,230 YES 7,230 ROANOKE 1,770 YES 1,770 SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN DIEGO 34,520 YES 34,520 SAN JAN 15,090 YES 175,690 YES 175,690 SAN JAN 15,090 YES 13,300 YES 15,090 SANTA ANA 13,300 YES 13,300 YES 15,090 SAVANNAH 4440 YES 9,040 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 YES 1,640 SHREVEPORT 1640 YES 5,380 YES 5,380						
RICHMOND 7,230 YES 7,230 ROANOKE 1,770 YES 1,770 SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN DIEGO 34,520 YES 34,520 SAN PANCISCO 175,690 YES 175,690 YES 175,690 SAN JAN 15,090 YES 13,300 YES 15,090 SANTA ANA 13,300 YES 13,300 YES 15,090 SAVANNAH 4440 YES 9,040 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 YES 1,640 SHREVEPORT 1640 YES 5,380 YES 5,380						
ROANOKE 1,770 YES 1,770 SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN DIEGO 34,520 YES 34,520 SAN ANCISCO 175,690 YES 175,690 YES 175,690 SAN JAN 15,090 YES 13,300 YES 15,090 SANTA ANA 13,300 YES 9,040 YES 4,440 SAVANNAH 4440 YES 1,610 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 YES 1,640 SHREVEPORT 1640 YES 5,380 YES 5,380						
SAGINAW 2,090 YES 2,090 SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN DIEGO 34,520 YES 34,520 SAN CISCO 175,690 YES 175,690 YES 175,690 YES 15,090 SAN JAN 15,090 YES 13,300 SARASOTA/BRADENTON 9,040 YES 9,040 SAVANNAH 4440 YES 1,610 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 5,380						
SALT LAKE CITY 17540 YES 17,540 SAN ANTONIO 12080 YES 12,080 SAN DIEGO 34,520 YES 34,520 SANCISCO 175,690 YES 175,690 SANTA ANA 15,090 YES 13,300 SANTA ANA 13,300 YES 13,300 SARASOTA/BRADENTON 9,040 YES 9,040 SAVANNAH 4440 YES 1,610 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 5,380 SOUTH BEND 5,380 YES 5,380						
SAN DIEGO 34,520 YES 34,520 SAL PANCISCO 175,690 YES 175,690 SAN DAN 15,090 YES 175,690 SANTA ANA 13,300 YES 13,300 SARASOTA/BRADENTON 9,040 YES 9,040 SAVANNAH 4440 YES 1,610 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 5,380 SOUTH BEND 5,380 YES 5,380				,	YES	17,540
SA RANCISCO 175,690 YES 175,690 YES 175,690 SANTA ANA 15,090 YES 13,300 YES 15,090 SANTA ANA 13,300 YES 13,300 YES 13,300 SARASOTA/BRADENTON 9,040 YES 9,040 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 YES 1,640 SHREVEPORT 1640 YES 5,380 YES 5,380	SAN ANTONIO				YES	12,080
SANJAN 15,090 YES 15,090 SANTA ANA 13,300 YES 13,300 SARASOTA/BRADENTON 9,040 YES 9,040 SAVANNAH 4440 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 1,640 SOUTH BEND 5,380 YES 5,380						
SANTA ANA 13,300 YES 13,300 SARASOTA/BRADENTON 9,040 YES 9,040 SAVANNAH 4440 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 1,640 SOUTH BEND 5,380 YES 5,380			YES	175,690		
SARASOTA/BRADENTON 9,040 YES 9,040 SAVANNAH 4440 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 1,640 SOUTH BEND 5,380 YES 5,380			VE0	40.000	YES	15,090
SAVANNAH 4440 YES 4,440 SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 1,640 SOUTH BEND 5,380 YES 5,380						
SCRANTON/WILKES-BARRE 1,610 YES 1,610 SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 1,640 SOUTH BEND 5,380 YES 5,380			IEO	9,040	VES	4 440
SEATTLE 29,480 YES 29,480 SHREVEPORT 1640 YES 1,640 SOUTH BEND 5,380 YES 5,380			YES	1 610	160	4,440
SHREVEPORT 1640 YES 1,640 SOUTH BEND 5,380 YES 5,380						
SOUTH BEND 5,380 YES 5,380				==,,,	YES	1.640
STATE COLLEGE 370 YES 370				5,380		•
	STATE COLLEGE	370	YES	370		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN DELTA'S BEYOND CITIES (REBUTTAL TO DL-301)

	FY JUNE 94 TORONTO TRAFFIC	<u>USAIR VIA</u> PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	<u>DELTA</u> via ATLANTA	FY JUNE 94 TORONTO TRAFFIC
ST. LOUIS	28,570	YES	28,570		
TALLAHASSEE	1590			YES	1,590
TAMPA	186,290	YES	186,290	YES	186,290
TOLEDO	710	YES	710		
VALPARAISO	1380			YES	1,380
WASHINGTON	45,040	YES	45,040		
WEST PALM BEACH	21,060	YES	21,060	YES	21,060
WHITE PLAINS	820	YES	820		
WICHITA	4300			YES	4,300
WILLIAMSPORT	520	YES	520		
YOUNGSTOWN	210	YES	210		
TOTAL	3,550,880	84	3,412,830	51	1,384,300

Notes: Excludes cities in western NY State and other cities with excessive circuity. For ATL, cities include those cited in DL's filing with roundtrip non-stop connections to YYZ. For PIT, cities include those cited in US's filing with roundtrip non-stop connections to YYZ.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN NORTHWEST'S BEYOND CITIES (REBUTTAL TO NW-301)

	FY JUNE 94 TORONTO TRAFFIC	<u>USAIR VIA</u> <u>PITTSBURGH</u>	FY JUNE 94 TORONTO TRAFFIC	NORTHWEST via MINNEAPOLIS	FY JUNE 94 TORONTO TRAFFIC
RDEEN, SD	60			YES	60
AKRON/CANTON	520	YES	520	720	00
ALBANY	2,070	YES	2,070		
ALBUQUERQUE	8,390		,	YES	8,390
ALLENTOWN	3,270	YES	3,270		
ALTOONA	120	YES	120		
APPLETON	4,080			YES	4,080
ASHLAND, KY/HUNTINGTON	310	YES	310		
ATLANTA	90,440	YES	90,440		
AUSTIN BALTIMORE	11,130 19,580	YES YES	11,130 19,580		
BEMIDJI, MN	210	IES	19,560	YES	210
BILLINGS	690			YES	690
BINGHAMTON	90	YES	90	120	000
BISMARCK	300			YES	300
BOISE	2,040			YES	2,040
BOSTON	213,410	YES	213,410		
BOZEMAN	650			YES	650
BURLINGTON	1,310	YES	1,310		
CHARLESTON, WV	540	YES	540		
CHARLOTTESVILLE	1,060	YES	1,060		
CHARLOTTE	19,900	YES	19,900		
CHICAGO CINCINNATI	325,130 8,340	YES YES	325,130 8,340		
CLARKSBURG	320	YES	320		
CLEVELAND	52,910	YES	52,910		
COLUMBUS	11,410	YES	11,410		
CUMBERLAND	150	YES	150		
DALLAS/FT. WORTH	108,920	YES	108,920		
DAYTON	3,390	YES	3,390		
DENVER	41,960	YES	41,960	YES	41,960
DES MOINES	5,610	\/ F 0	04.070	YES	5,610
DETROIT	81,870	YES	81,870	VEO	4 400
DULUTH FARGO	1,160 1,280			YES YES	1,160
FLINT	720	YES	720	IES	1,280
FT. LAUDERDALE	34,950	YES	34,950		
FT. MYERS	15,100	YES	15,100		
FT. WAYNE	3,690	YES	3,690		
GRAND FORKS	490			YES	490
GRAND RAPIDS	10,610	YES	10,610		
GREAT FALLS	200			YES	200
GREENBRIER	60	YES	60		
GREENSBORO/HIGH POINT	8,330	YES	8,330		
HAGERSTOWN HARRISBURG	340 4,710	YES YES	340 4,710		
HARTFORD	24,040	YES	24,040		
HOMETON	22,530	YES	22,530		
INL APOLIS	15,520	YES	15,520		
INTERNATIONAL FALLS	310		.0,020	YES	310
ISLIP/LONG ISLAND	990	YES	990		
JOHNSTOWN	50	YES	50		
KALAMAZOO	3,920	YES	3,920		
KANSAS CITY	21,180	YES	21,180		
KNOXVILLE	4,440	YES	4,440	VEC	4 000
LA CROSSE LANCASTER	1,060 860	YES	860	YES	1,060
LANSING	1,570	YES	1,570		
	1,010		.,0.0		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN NORTHWEST'S BEYOND CITIES (REBUTTAL TO NW-301)

	FY JUNE 94 TORONTO TRAFFIC	<u>USAIR VIA</u> PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	NORTHWEST via MINNEAPOLIS	FY JUNE 94 TORONTO TRAFFIC
VEGAS	32,500	YES	32,500	YES	32,500
LEXINGTON/FRANKFORT LINCOLN	2,120 2,360	YES	2,120	YES	2,360
LOS ANGELES	242,650	YES	242,650	YES	242,650
LOUISVILLE	7,230	YES	7,230		,
LYNCHBURG	440	YES	440		
MANCHESTER MASON CITY	1,690 130	YES	1,690	YES	130
MIAMI	208,180	YES	208,180	150	130
MILWAUKEE	25,760	YES	25,760		
MINNEAPOLIS/ST.PAUL	53,220	YES	53,220		
MINOT	380			YES	380
MODICANTOWN	3,480	VEC	160	YES	3,480
MORGANTOWN NASHVILLE	160 45,340	YES YES	45,340		
NEW ORLEANS	30,250	YES	30,250		
NEWARK	752,110	YES	752,110		
NEWBURGH	340	YES	340		
NORFOLK	5,240	YES	5,240		
OMAHA	5,510			YES	5,510
ONTARIO ORLANDO	9,580 67,810	YES	67,810	YES	9,580
PARKERSBURG	67,810 230	YES	230		
PHILADELPHIA	111,630	YES	111,630		
PHOENIX	56,890	YES	56,890	YES	56,890
PORTLAND, OR	13,560			YES	13,560
PROVIDENCE	2,330	YES	2,330		
RALEIGH/DURHAM	30,440	YES	30,440	\/F0	500
RAPID CITY READING	580 810	YES	810	YES	580
RENO	6,290	IES	010	YES	6,290
RHINELANDER	330			YES	330
RICHMOND	7,230	YES	7,230		
ROANOKE	1,770	YES	1,770		
ROCHESTER	3,430			YES	3,430
ROCKFORD	1,250			YES	1,250
SACRAMENTO SAGINAW	7,690 2,090	YES	2,090	YES	7,690
SALT LAKE CITY	17,540	123	2,090	YES	17,540
SAN DIEGO	34,520	YES	34,520	, 20	,0.10
SAN FRANCISCO	175,690	YES	175,690	YES	175,690
SAN JUAN	15,090				
SANTA ANA	13,300	YES	13,300	YES	13,300
SARASOTA/BRADENTON SCRANTON/WILKES-BARRE	9,040 1,610	YES YES	9,040 1,610		
SEATTLE	29,480	YES	29,480	YES	29,480
SIOUX CITY	760	,,,	20,100	YES	760
SIONEFALLS	1,300			YES	1,300
SOBEND	5,380	YES	5,380		
SPOKANE	3,070	V=0	^	YES	3,070
STATE COLLEGE	370 28 570	YES	370 38 570		
ST. LOUIS TAMPA	28,570 186,290	YES YES	28,570 186,290		
TOLEDO	710	YES	710		
TUCSON	15,070		. 10	YES	15,070
WASHINGTON	45,040	YES	45,040		
WATERTOWN	20			YES	20
WAUSAU	1,100			YES	1,100

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN NORTHWEST'S BEYOND CITIES (REBUTTAL TO NW-301)

	FY JUNE 94 TORONTO TRAFFIC	USAIR VIA PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	NORTHWEST via MINNEAPOLIS	FY JUNE 94 TORONTO TRAFFIC
ST PALM BEACH WHITE PLAINS WILLIAMSPORT YOUNGSTOWN	21,060 820 520 210	YES YES YES YES	21,060 820 520 210		
TOTAL	3,547,880	84	3,412,830	42	712,430

Notes: Excludes cities with excessive circuity.

For MSP, cities include those cited in NW's filing with roundtrip non-stop connections to YYZ. For PIT, cities include those cited in US's filing with roundtrip non-stop connections to YYZ.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN TWA'S BEYOND CITIES (REBUTTAL TO TW-301)

	FY JUNE 94 TORONTO TRAFFIC	<u>USAIR VIA</u> PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	TWA via ST. LOUIS	FY JUNE 94 TORONTO TRAFFIC
AKRON/CANTON	520 2,070	YES YES	520 2,070		
ALBANY ALBUQUERQUE	8390	TES	2,070	YES	8,390
ALLENTOWN	3,270	YES	3,270	120	0,000
ALTOONA	120	YES	120		
ASHLAND, KY/HUNTINGTON		YES	310		
ATLANTA	90,440	YES	90,440		
AUSTIN	11,130	YES	11,130	YES	11,130
BALTIMORE	19,580	YES	19,580		
BINGHAMTON	90	YES YES	90		
BOSTON BURLINGTON. IO	213,410 570	153	213,410	YES	570
BURLINGTON, VE	1,310	YES	1,310	123	/ 370
CEDAR RAPIDS/IOWA	4360	120	1,010	YES	4,360
CHAMPAIGN	1160			YES	1,160
CHARLESTON	540	YES	540		,,,,,,,
CHARLOTTESVILLE	1,060	YES	1,060		
CHARLOTTE	19,900	YES	19,900		
CHICAGO	325,130	YES	325,130		
CINCINNATI	8,340	YES	8,340		
CLARKSBURG	320	YES	320		
CLEVELAND	52,910	YES	52,910		
COLORADO SPRINGS	4280			YES	4,280
COLUMBIA, MISSOURI	120	VEC	11 110	YES	120
COLUMBUS,OH	11,410 150	YES YES	11,410 150		
CUMBERLAND DALLAS/FT. WORTH	108,920	YES	108,920	YES	108,920
DAYTON	3,390	YES	3,390	120	100,520
DECATUR	350	. 20	0,000	YES	350
DENVER	41,960	YES	41,960	YES	41,960
DES MOINES	5610			YES	5,610
DETROIT	81,870	YES	81,870		
EVANSVILLE	1900			YES	1,900
FAYETTEVILLE, AR	3010			YES	3,010
FLINT	720	YES	720		
FT. LAUDERDALE	34,950	YES	34,950		
FT. MYERS	15,100	YES	15,100		
FT. WAYNE	3,690 10,610	YES YES	3,690 10,610		
GRAND RAPIDS GREENBRIER	10,610	YES	10,610		
GREENSBORO/HIGH POINT	8,330	YES	8,330		
HAGERSTOWN	340	YES	340		
HARRISBURG	4,710	YES	4,710		
HARTFORD	24,040	YES	24,040		
HOTON	22,530	YES	22,530		
INDIANAPOLIS	15,520	YES	15,520		
ISLIP/LONG ISLAND	990	YES	990		
JOHNSTOWN	50	YES	50		
JOPLIN	350	VEC	0.000	YES	350
KALAMAZOO	3,920	YES	3,920	VEC	04 400
KANSAS CITY KNOXVILLE	21,180 4,440	YES YES	21,180 4,440	YES	21,180
LANCASTER	4,440 860	YES	4,440 860		
LANSING	1,570	YES	1,570		
	.,	· 	.,		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN TWA'S BEYOND CITIES (REBUTTAL TO TW-301)

	FY JUNE 94 TORONTO TRAFFIC	USAIR VIA PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	<u>TWA</u> via ST. LOUIS	FY JUNE 94 TORONTO TRAFFIC
LAS VEGAS LEXINGTON/FRANKFORT	32,500 2,120	YES YES	32,500 2,120	YES	32,500
LINCOLN	2360	.20	2,120	YES	2,360
LITTLE ROCK	4060			YES	4,060
LOS ANGELES	242,650	YES	242,650	YES	242,650
LOUISVILLE	7,230	YES	7,230		
LYNCHBURG,VA	440	YES	440		
MANCHESTER	1,690	YES	1,690	VEC	11 170
MEMPHIS MIAMI	11470 208,180	YES	208,180	YES	11,470
MILWAUKEE	25,760	YES	25,760		
MINNEAPOLIS/ST.PAUL	53,220	YES	53,220	YES	53,220
MOLINE	3480			YES	3,480
MORGANTOWN	160	YES	160		·
NASHVILLE	45,340	YES	45,340		
NEW ORLEANS	30,250	YES	30,250	YES	30,250
NEWARK	752,110	YES	752,110		
NEWBURGH	340	YES	340		
NORFOLK	5,240	YES	5,240	VEC	4 200
OKLAHOMA CITY OMAHA	4390 5510			YES YES	4,390 5,510
ONTARIO	9580			YES	9,580
ORLANDO	67,810	YES	67,810	120	0,000
PADUCAH	310	. 20	07,070	YES	310
PARKERSBURG	230	YES	230		
PEORIA	1660			YES	1,660
PHILADELPHIA	111,630	YES	111,630		
PHOENIX	56,890	YES	56,890	YES	56,890
PORTLAND	13560			YES	13,560
PROVIDENCE	2,330	YES	2,330	VEO	4770
QUINCY	170 30,440	YES	30,440	YES	17 0
RALEIGH/DURHAM READING	30,440 810	YES	30,440 810		
RICHMOND	7,230	YES	7,230		
ROANOKE	1,770	YES	1,770		
SACRAMENTO	7690		,,,,,	YES	7,690
SAGINAW	2,090	YES	2,090		ŕ
SALT LAKE CITY	17540			YES	17,540
SAN ANTONIO	12080			YES	12,080
SAN DIEGO	34,520	YES	34,520	YES	34,520
SAN FRANCISCO	175,690	YES	175,690	YES	175,690
SAN JOSE SANTA ANA	13840 13,300	YES	13,300	YES YES	13,840 13,300
SARASOTA/BRADENTON	9,040	YES	9,040	150	13,300
SCONTONWILKES-BARRE		YES	1,610		
SE TLE	29,480	YES	29,480	YES	29,480
SHREVEPORT	1640		,	YES	1,640
SIOUX FALLS	1300			YES	1,300
SOUTH BEND	5,380	YES	5,380		
SPRINGFIELD,IL	800			YES	800
SPRINGFIELD, MO	1170	VEC		YES	1,170
STATE COLLEGE	370	YES	370		
ST. LOUIS	28,570 186 200	YES YES	28,570 186,290		
TAMPA	186,290	150	100,290		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY HAVE FAR MORE TRAFFIC THAN TWA'S BEYOND CITIES (REBUTTAL TO TW-301)

	FY JUNE 94 TORONTO TRAFFIC	<u>USAIR VIA</u> PITTSBURGH	FY JUNE 94 TORONTO TRAFFIC	TWA via ST. LOUIS	FY JUNE 94 TORONTO TRAFFIC
TOLEDO	710	YES	710		
TULSA	5450			YES	5,450
WASHINGTON	45,040	YES	45,040		
WATERLOO	780			YES	780
WEST PALM BEACH	21,060	YES	21,060		
WHITE PLAINS	820	YES	820		
WICHITA	4300			YES	4,300
WILLIAMSPORT	520	YES	520		
WORCESTER	210				
YOUNGSTOWN	210	YES	210		
TOTAL	3,566,280	84	3,412,830	46	1,004,930

Notes: Excludes cities with excessive circuity.

For STL, cities include those cited in TWA's filing with roundtrip non-stop connections to YYZ. For PI.T, cities include those cited in US's filing with roundtrip non-stop connections to YYZ

USAIR'S FORECAST IS THE MOST CONSERVATIVE AMONG THE APPLICANTS

USAIR'S GROWTH RATES EXCLUDING SERVICE STIMULATION ARE MORE CONSERVATIVE THAN THE OTHER APPLICANTS

(REBUTTAL TO CO-301, DL-301, NW-301, AND TW-301)

	ANNUAL GROWTH 1/	GROWTH TO YEAR ENDING MARCH 1996 2/	OTHER APPLICANTS GREATER THAN USAIR (PERCENTAGE POINTS)
USAIR	1.9%	3.3%	-
CONTINENTAL	L 5.0%	15.0%	11.7
TWA	4.5%	7.8%	4.5
DELTA	3.0%	6.4%	3.1
NORTHWEST	3.0%	6.3%	3.0

1/ CO-301, DL-301, NW-301, TW-301 EXCLUDING STIMULATION AND INCLUDING OTHER ADJUSTMENTS.
2/ CO, DL, AND NW GROWTH RATES REDUCED BY 0.5 PERCENTAGE POINTS TO REFLECT ACTUAL GROWTH FROM CY 1993 BASE TO FY 1994. CO, DL, AND NW USED THE CY 1993 BASE FOR FORECASTING INSTEAD OF FY 1994.

USAIR'S TRAFFIC AND LOAD FACTORS WOULD INCREASE SIGNIFICANTLY

IF IT USED THE OTHER APPLICANTS TRAFFIC GROWTH RATES

USAIR'S GROWTH RATES EXCLUDING SERVICE STIMULATION ARE MORE CONSERVATIVE THAN THE OTHER APPLICANTS

(REBUTTAL TO CO-301, DL-301, NW-301, AND TW-301)

	USAIR'S TRAFFIC FORECAST INCLUDING OTHER CARRIERS GROWTH 1/	INCREASE IN USAIR'S TRAFFIC FORECAST	USAIR'S LOAD FACTOR INCLUDING OTHER CARRIERS GROWTH	INCREASE IN LOAD FACTOR (PERCENTAGE POINTS)
USAIR	158,000	-	63.2%	-
CONTINENTAL	176,486	18,486	70.6%	7.4
TWA	165,105	7,105	66.0%	2.8
DELTA	162,861	4,861	65.1%	1.9
NORTHWEST	162,713	162,713 4,713 65.1%		1.9

1/ SOURCE: US-R-110, INCREASED GROWTH APPLIED TO USAIR'S TRAFFIC FORECAST.

USAIR'S SERVICE VIA PITTSBURGH WILL CARRY MORE BEHIND GATEWAY TRAFFIC THAN ANY OTHER APPLICANT (REBUTTAL TO CO-301, DL-301, NW-301, AND TW-301)

USAIR'S

	GATEWAY	BEHIND GATEWAY TRAFFIC 1/	BEHIND GATEWAY TRAFFIC GREATER THAN OTHER APPLICANTS
USAIR	PITTSBURGH	142,441	
TWA	ST. LOUIS	58,941	83,500
CONTINENTAL	NEWARK	66,068	76,373
NORTHWEST	MINNEAPOLIS	90,928	51,513
DELTA	ATLANTA	103,426	39,015

1/ US-R-101.

USAIR WILL OFFER MORE SEATS THAN ANY OTHER APPLICANT

(REBUTTAL TO: CO-201, DL-101, NW-202, AND TW-151)

USAIR'S

	USAIR'S SEATS PER FLIGHT 1/	USAIR'S ANNUAL SEATS 2/	ANNUAL SEATS GREATER THAN OTHER APPLICANTS	% USAIR GREATER THAN OTHER APPLICANTS
USAIR	182	265,720		
NORTHWEST	100	146,000	119,720	82.0%
CONTINENTAL	128	186,880	78,840	42.2%
TWA	132	192,720	73,000	37.9%
DELTA	180	262,800	2,920	1.1%

^{1/} US-R-101.

^{2/} BASED ON NORMAL YEAR FOR PROPOSED SCHEDULES. USAIR'S SEATS IN FORECAST PERIOD REFLECT DC-9 OPERATIONS DURING THE FIRST MONTH STARTUP PERIOD.

USAIR WILL OFFER MORE SEATS TO SINGLE PLANE BEHIND POINTS THAN ANY OTHER APPLICANT (REBUTTAL TO: CO-201, DL-101, NW-202, AND TW-151)

	USAIR'S SEATS PER FLIGHT 1/	USAIR'S ANNUAL SEATS TO BEHIND POINTS 2/	USAIR'S ANNUAL SEATS GREATER THAN OTHER APPLICANTS	% USAIR GREATER THAN OTHER APPLICANTS
USAIR	182	265,720		
DELTA	-	0	265,720	N/A
NORTHWEST	100	146,000	119,720	82.0%
CONTINENTAL	128	186,880	78,840	42.2%
TWA	132	192,720	73,000	37.9%

US-R-101.
 BASED ON NORMAL YEAR FOR PROPOSED SCHEDULES. USAIR'S SEATS IN FORECAST PERIOD REFLECT DC-9 OPERATIONS DURING THE FIRST MONTH STARTUP PERIOD.

USAIR'S CURRENT ACCESS TO TORONTO FROM ITS HUBS IS LIMITED (REBUTTAL TO CO-502)

USAIR HUB	JET SERVICE TO TORONTO
PITTSBURGH	NO
CHARLOTTE	NO
PHILADELPHIA	YES
BAI TIMORE	NO

CONTINENTAL IS AUTHORIZED FOR US GATEWAY SERVICE TO TORONTO

(REBUTTAL TO CO-502)

CARRIER

AUTHORIZED US GATEWAY

CONTINENTAL

HOUSTON Exemption authority Order 95-2-52

CITIES IN CONTINENTAL'S NEWARK FORECAST THAT MAY BE BETTER SERVED VIA HOUSTON

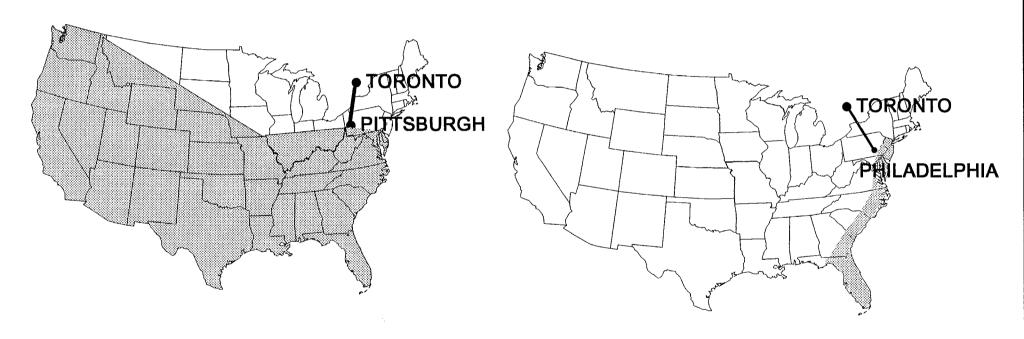
ALBUQUERQUE
CORPUS CHRIST
EL PASO
HARLINGEN
HOUSTON
LAS VEGAS
LAKE CHARLES
LAFAYETTE
LAREDO
MIDLAND/ODESSA
NEW ORLEANS
PHOENIX
SAN ANTONIO
TUCSON
VICTORIA,TEXAS

USAIR'S PITTSBURGH HUB OFFERS MUCH BROADER NON-CICCUITOUS ACCESS TO TORONTO THAN ITS PHILADELPHIA HUB

(REBUTTAL TO: CO-502, TW-100)

PITTSBURGH HUB

PHILADELPHIA HUB



NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA PITTSBURGH AND PHILADELPHIA.

PITTSBURGH IS A MORE DIRECT GATEWAY TO TORONTO THAN PHILADELPHIA FOR 80 USAIR CITIES WITH 2.4 MILLION TORONTO PASSENGERS

(REBUTTAL TO: CO-502 AND TW-100)

	TORONTO TRAFFIC FY 1994 1/	TORONTO NONSTOP MILES	VIA PITTSBUR MILES CIRC		ADELPHIA CIRCUITY
AKRON/CANTON	520	212	292 3	7.4% 681	220.4%
ALBUQUERQUE	8,390	1,551	1,705	9.9% 2090	34.7%
ALTOONA	120	243		3.1% 512	110.6%
ATLANTA	90,440	740	748	1.1% 1012	36.8%
AUSTIN	11,130	1,354	1,428	5.4% 1773	30.9%
BALTIMORE	19,580	347	432 2	4.4% 437	25.9%
BINGHAMTON	90	211		3.9% 513	
BIRMINGHAM	4,510	797		2.9% 1118	
BURLINGTON	1,310	326		7.4% 683	
CHARLESTON, WV	540	381		1.1% 702	
CHARLOTTESVILLE	1,060	387		5.7% 556	
CHARLOTTE	19,900	588		0.0% 794	
CHICAGO	325,130	436		5.5% 1023	
CINCINNATI	8,340	413		5.6% 852	
CLARKSBURG/FAIRMONT	320	305		0.2% 615	
CLEVELAND	52,910	193		9.6% 709	
COLUMBUS	11,410	305		9.9% 751	
CUMBERLAND	150	284		2.6% 535	
DALLAS/FT. WORTH	108,920	1,199	,	7.4% 1647	
DAYTON	3,390	352		3.8% 822	
DENVER	41,960	1,325		4.8% 1912	
DETROIT	81,870	214		8.1% 799	
ELMIRA/CORNING	30	173		8.1% 527 4.0% 1018	
EVANSVILLE	1,900	568 213		4.0% 1018 1.6% 836	
FLINT FRANKLIN/OIL CITY	720 30	213 159		0.0% 610	
FT. LAUDERDALE	34,950	1,217		0.0% 610	
FT. MYERS	15,100	1,190		0.1% 1341	12.7%
FT. WAYNE	3,690	340		2.3% 875	
GRAND RAPIDS	10,610	302		9.4% 918	
GREENBRIER, WV	60	404		0.0% 657	
GREENSBORO,NC	8,330	525		0.3% 712	
HAGERSTOWN	340	291		5.2% 479	
HARRISBURG/YORK	4,710	282		3.8% 430	
HOUSTON	22,530	1,280		4.5% 1670	
HUNTINGTON	310	398		4.1% 752	
INDIANAPOLIS	15,520	439	546 2	4.5% 932	112.6%
JACKSONVILLE,FL	9,190	919	919	0.0% 1090	18.6%
JOHNSTOWN	[,] 50	236		5.7% 539	128.5%
KALAMAZOO/BATTLE CREEK	3,920	316	523 6	5.7% 908	187.4%
KANSAS CITY	21,180	837	994 1	8.8% 1383	65.3%
KNOXVILLE	4,440	591	604	2.2% 900	52.3%
LANSING	1,570	257	497 9	3.1% 871	238.4%
LAS VEGAS	32,500	1,939	2,128	9.7% 2518	29.8%
LEXINGTON/FRANKFORT	2,120	468	510	9.0% 865	84.7%
LOSANGELES	242,650	2,171		8.4% 2743	26.3%
LOCALILLE	7,230	49 6		2.2% 922	
LYNGABURG	440	439		1.7% 623	
MEMPHIS	11,470	812		7.5% 1219	
MIAMI	208,180	1,236		0.1% 1362	
MILWAUKEE	25,760	419		5.8% 1035	
MINNEAPOLIS/ST. PAUL	53,220	677		0.0% 1325	
MORGANTOWN	160	279		1.1% 595	
NASHVILLE	45,340	641		6.5% 1020	
NEW ORLEANS	30,250	1,111		2.6% 1434	
NEWPORT NEWS	770	481	529	9.9% 548	13.8%

PITTSBURGH IS A MORE DIRECT GATEWAY TO TORONTO THAN PHILADELPHIA FOR 80 USAIR CITIES WITH 2.4 MILLION TORONTO PASSENGERS

(REBUTTAL TO: CO-502 AND TW-100)

	TORONTO TRAFFIC FY 1994 1/	TORONTO NONSTOP MILES	VIA PITTSBURGH MILES CIRCUI		ADELPHIA CIRCUITY
NORFOLK	5,240	502	552 9.9	% 559	11.3%
ORANGE COUNTY	13,300	2,154	2,332 8.3	% 2721	26.4%
ORLANDO	67,810	1,058	1,058 0.0	% 1210	14.4%
PARKERSBURG	230	314	323 3.0	678	116.2%
PHOENIX/SCOTTSDALE	56,890	1,872	2,032 8.5	3% 2417	29.1%
PITTSBURGH	31,120	222	223 0.3	% 614	176.3%
RALEIGH/DURHAM	30,440	541	550 1.7	% 683	26.3%
RICHMOND	7,230	443	480 8.4	% 545	22.9%
ROANOKE	1,770	439	441 0.3	% 6 57	49.5%
SAGINAW	2,090	223	511 128.8	% 868	288.9%
SAN ANTONIO	12,080	1,425	1,49 7 5.1		29.2%
SAN DIEGO	34,520	2,153	2,324 7.9		25.9%
SAN FRANCISCO	175,690	2,254	2,470 9.6		27.0%
SARASOTA/BRADENTON	9,040	1,137	1,137 0.0	% 1305	14.8%
SEATTLE/TACOMA	29,480	2,055	2,341 14.0		32.3%
SOUTH BEND	5,380	366	550 50.2		156.6%
STATE COLLEGE	370	220	347 57.8		127.0%
ST. LOUIS	28,570	653	<i>7</i> 74 18.5	% 1158	77.3%
TAMPA	186,290	1,097	1,097 0.0	% 1268	15.6%
TOLEDO	710	257	423 64.8	% 810	215.7%
WASHINGTON	45,040	360	426 18.5	% 466	29.5%
WEST PALM BEACH	21,060	1,175	1,176 0.1	% 1300	10.6%
WILLIAMSPORT	520	218	40 3 8 5.1	% 476	118.9%
YOUNGSTOWN	210	176	280 59.4	% 647	268.3%
	2,376,340				
TOTAL TORONTO O&D	3,857,460				
PER CENT OF TOTAL	62%				

1/ DOT INFORMATION RESPONSE U.S.-TORONTO O&D. NOTE: MILEAGE FROM COMPANY RECORDS.

CONTINENTAL'S SERVICE PROPOSAL WILL DUPLICATE AIR CANADA'S NEWARK TORONTO SERVICE

(REBUTTAL TO CO-201)

AIR CANADA DEPARTURES TO TORONTO FROM NEWARK APRIL 3, 1995

08:00

AIR CANADA DEPARTURES TO NEWARK FROM TORONTO APRIL 7, 1995

07:50

		CO PROPOSED 08:10
	10:30	10:40
	12:45	13:40
CO PROPOSED	15:04	
	16:15	15:15
	17:10	17:50
		CO PROPOSED 17:50
	18:55	20:00
CO PROPOSED	20:30	

SOURCE: OAG AND AND CO-201.

NOTE: AIR CANADA OWNS 19.6% OF CONTINENTAL.

CONTINENTAL WILL DUPLICATE ITS OWNER'S (AIR CANADA) ONLINE CODE SHARE CONNECTIONS TO POINTS BEYOND NEWARK (REBUTTAL TO CO-202)

POTENTIAL CODE SHARE CONNECTIONS FOR AIR CANADA IN NEWARK

ARRIVALS AIR CANADA LV 07:50 A 9:10 ARRIVALS AIR CANADA LV 17:50 AR 19:10

		lacksquare	
CONTINENTAL		CONTINENTAL	
DEPARTURE TO:	TIME	DEPARTURE TO:	TIME
ATLANTA	1000	ORLANDO	1940
ATLANTIC CITY	1000	SYRACUSE	1945
BOSTON	1000	HOUSTON	1950
WORCESTER	1000	GREENSBORO	1950
PHILADELPHIA	1010	FT. MYERS	1950
RICHMOND	1015	CLEVELAND	1950
TAMPA	1020	JACKSONVILLE	1950
FT. LAUDERDALE	1020	BANGOR	1955
WEST PALM BEACH	1025	BUFFALO	1955
DETROIT	1025	PHOENIX	1955
MANCHESTER .NH	1025	ATLANTIC CITY	1955
DAYTONA BEACH	1025	ST. LOUIS	1955
FT. MYERS	1025	PHILADELPHIA	1955
PORTLAND	1025	CHICAGO	2000
BUFFALO	1030	PROVIDENCE	2000
SAN JUAN	1035	WASHINGTON	2000
ALLENTOWN	1035	RICHMOND	2000
DENVER	1035	ALLENTOWN	2000
BANGOR	1040	BOSTON	2000
PROVIDENCE	1040	BINGHAMTON	2000
HOUSTON	1045	ATLANTA	2000
MIAMI	1045	SARASOTA	2005
ORLANDO	1100	MIAMI	2005
CHICAGO	1100	TAMPA	2005
WASHINGTON	1100	LOS ANGELES	2010
ROCHESTER	1120	KANSAS CITY	2010
NORFOLK	1140	MANCHESTER, NH	2015
HARRISBURG	1140	BURLINGTON	2015
HARTFORD	1145	ROCHESTER	2015
CLEVELAND	1150	HARRISBURG	2015
COLUMBUS	1205	WORCESTER	2015
INDIANAPOLIS	1230	DETROIT	2015
ALBANY	1230	ALBANY	2220
		WEST PALM BEACH	2030
		BALTIMORE	2030
		DAYTON	2035
		FT. LAUDERDALE	2035
		PORTLAND	2105

HARTFORD

2110

SOURCE: OAG CO-201, AND CO-202.

CONTINENTAL WILL DUPLICATE ITS OWNER'S (AIR CANADA) ONLINE CODE SHARE CONNECTIONS TO POINTS BEYOND NEWARK (REBUTTAL TO CO-202)

POTENTIAL CODE SHARE CONNECTIONS FOR AIR CANADA IN NEWARK

CONTINENTAL ARRIVALS FROM:	TIME	CONTINENTAL ARRIVALS FROM:	TIME
PITTSBURGH	1215	ALBANY	1750
RICHMOND	1224	LOS ANGELES	1755
SYRACUSE	1230	COLUMBUS	1802
WORCESTER	1238	NEW ORLEANS	1815
BANGOR	1300		
COLUMBUS	1306		
MANCHESTER	1316		
INDIANAPOLIS	1319		
DAYTON	1325		
BUFFALO	1326		
CLEVELAND	1328		
PHILADELPHIA	1330		
DENVER	1343		
HARRISBURG	1350		
HARTFORD	1355		
ORLANDO	1358		
BALTIMORE	1400		
CHICAGO	1400		
PORTLAND	1405		
WASHINGTON	1407		
JACKSONVILLE	1408		
ATLANTA	1415		
HOUSTON	1415		į
PROVIDENCE	1415		
BOSTON	1417		
MINNEAPOLIS	1418		
DETROIT	1420		
ROCHESTER	1425		
MELBOURNE	1434		
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	AIR CANA		AIR CANADA
	LV EWR 10	615	LV EWR 1855

SOURCE: OAG, CO-201, CO-202. NOTE: DOES NOT INCLUDE ADDITIONAL CONNECTIONS TO EIGHT OTHER AIR CANADA FLIGHTS.

Certificate of Service

I certify that on this day I served the Rebuttal Exhibits of USAir, Inc. by handdelivery, or by air courier if so indicated, upon the following:

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